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Attorneys for Defendant
KYROLLOS MEKAIL

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KYROLLOS MEKAIL

Defendant.

Case No. 2:24-CR-00391-MCS-MAA

**DECLARATION OF ASHWIN J.
RAM IN SUPPORT OF
STIPULATED APPLICATION TO
MODIFY CONDITIONS OF
RELEASE**

*[Filed concurrently with Stipulated
Application to Modify Conditions of
Release and [Proposed] Order]*

Hon. Maria A. Audero

DECLARATION OF ASHWIN J. RAM

I, Ashwin J. Ram, declare as follows:

1. I represent Kyrollos Mekail in this matter. I am licensed to practice in the State of California, and I am admitted to practice before this Court.

2. The current conditions of Mr. Mekail's bond were set on July 8, 2024. ECF No. 15.

3. Mr. Mekail's release is monitored by United States Probation and Pretrial Services and Probation Officer Brianna Lamar-Harkness.

4. The conditions of Mr. Mekail's bond prohibit him from selling, transferring, or giving away any asset valued at \$1,000 or more without notifying and obtaining permission from the Court, except for the payment of attorneys fees related to this case. ECF No. 15 at 2.

5. Mr. Mekail maintains an insurance policy with State Farm Insurance which requires a monthly payment of \$1,292.82.

6. Mr. Mekail has dutifully complied with all direction from Pretrial Services and has appeared for all in-person proceedings.

7. On August 20, 2024, United States Probation Officer Brianna Lamar-Harkness advised counsel of record for Mr. Mekail that the office of United States Probation and Pretrial Services does not oppose Mr. Mekail's request to revise the condition prohibiting Mr. Mekail from selling, transferring, or giving away any asset valued at \$1,000 or more without notifying and obtaining permission from the Court, except for the payment of attorneys fees related to this case to instead prohibit Mr. Mekail from selling, transferring, or giving away any asset valued at \$1,300 or more without notifying and obtaining permission from the Court, except for the payment of attorneys fees related to this case or payments on a credit card bill in which the individual transactions do not exceed \$1,300.

8. On August 27, 2024, Assistant United States Attorney Roger Hsieh

1 advised counsel of record for Mr. Mekail that the government stipulates to and does not
2 oppose Mr. Mekail's request to revise the condition prohibiting Mr. Mekail from
3 selling, transferring, or giving away any asset valued at \$1,000 or more without
4 notifying and obtaining permission from the Court, except for the payment of attorneys
5 fees related to this case to instead prohibit Mr. Mekail from selling, transferring, or
6 giving away any asset valued at \$1,300 or more without notifying and obtaining
7 permission from the Court, except for the payment of attorneys fees related to this case
8 or payments on a credit card bill in which the individual transactions do not exceed
9 \$1,300.

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11 I declare under penalty of perjury that the foregoing is true and correct and that
12 this declaration was executed on August 28, 2024 in Los Angeles, California.

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14 /s/ Ashwin J. Ram

15 Ashwin J. Ram
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